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**UNITED STATES DISTRICT COURT
DISTRICT OF NEW HAMPSHIRE**

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Randall S. Collier,	*	
Plaintiff,	*	
v.	*	Case No. 22-cv-00162-LM
James M. Carroll, et al.,	*	
Defendants.	*	

PLAINTIFF'S AMENDED MOTION TO EXTEND TIME, TO RESPOND TO DEFENDANT'S MOTION TO DISMISS...

Because I (this "Plaintiff", Randall S. Collier) am not represented by a Lawyer ("pro-se"), I require and hereby request more time to prepare a sufficient response to cases and laws referenced in the "Judicial Defendant's Memorandum in Support of Motion to Dismiss". Therefore I request this court extend time to respond an additional 21 days at least, or 30 or more if possible. It seems after extending the time for Defendants to respond after waiting the entire 60 days due to the Defendant's lawyer being too busy with other cases, which could have been intentional on their part to deprive this Plaintiff of sufficient response time too, considering this Plaintiff is Pro-Se and cannot be bound by technical rules like Lawyers can per court rules, to not extend time for this Plaintiff to respond to these Defendants' motion to dismiss would seem like an injustice and possibly even a criminal act for this US District Court Judge to order.

So far it seems the "Judicial Defendants" have made some valid points I (Randall S. Collier) need to research in order to respond to, such as federal courts not functioning in place of a State appeals court, but they have only helped improve my basic claims of how the previous State courts did violate due process of law, by infringing parental rights and taking Jurisdiction over myself (Randall S. Collier) without probable cause and criminal prosecution according to due process of criminal law and so forth. So I require this additional time to read several court cases and laws and prepare a sufficient response to the Defendant's Motion and Memorandum.

One example is N.H. Law RSA 173B governs the issuance of these orders of protection, but is not part of the criminal codes in RSA 625 thru 651 (nor therefore are these orders governed by criminal procedure as they should be), but note RSA 173 does require a showing of "abuse" which is defined as several actual "crimes" which are actually part of the criminal code. Therefore once these previous courts found lack of probable cause to accuse this father of any actual "crime" against this child it could not have any "lawful" "jurisdiction" over this father against his will after that point. So that is one basic argument which seems to be holding true so far in this case.

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Also in cases like *Fitzpatrick v. Bitzer*, 427 U.S. 445 (1976) and *Grable & Sons Metal Products, Inc. v. Darue Engineering & Mfg.*, 545 U.S. 308 (2005) it has been decided that the US District Courts can hear cases against States for violating Federal equal individual Human rights protected by the 14th Amendment and thus "Laws made in Pursuance" of "the supreme Law of the Land" and "the common law".

Furthermore the best interests of the child are supposed to be the main purpose of these family courts to protect, and it seems a clear conflict of interest to require We the People to exhaust all possible remedies in State courts before resorting to Suit against a State in US Courts when the State is the cause of the injustice in question as in this case, with NH and other Family Courts and State agencies routinely violating fundamental principles of due process of law like in this case.

Now I require more time to read the Defendants Memorandum and sources of authority referenced therein and other relevant cases and laws and so forth, to prepare a sufficient response to Defendant's Motion to Dismiss and Memorandum, of at least 21 or 30 days please (however I intend to respond as soon as possible to minimize the time our child is without his biological father in his life. Note the Protective Order is currently still active 9 years later with a total of 12 total years given, with no custody, no physical contact, and all skype communications have ceased.)

Respectfully submitted by: Randall S. Giller RSG 11/7/22
